

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

REGINALD KERCHEVAL

VS.

**PERMA R. PRODUCTS, INC. AND
JIMMY HAYNES**

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CIVIL ACTION NO. 1:19-CV-00050

DEFENDANTS' INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26 and the Local Rules, Defendants, **PERMA R. PRODUCTS, INC. AND JIMMY HAYNES**, make the following Initial Disclosures to all other parties:

- (A) the name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

Response:

PARTIES:

**Plaintiff: Reginald Kercheval
Paul Higdon
HIGDON LAWYERS
2929 Allen Parkway, Suite 200
Houston, Texas 77019
T: 713-223-7300
F: 713-223-73331**

**Defendant: Perma R. Products, Inc.
Karen M. Alvarado
Brothers Alvarado, P.C.
820 Gessner, Suite 1075
Houston, Texas 77024
T: 713-337-0750
F: 713-337-0760
kalvarado@brothers-law.com**

Defendant: Jimmy Haynes
Karen M. Alvarado
Brothers Alvarado, P.C.
820 Gessner, Suite 1075
Houston, Texas 77024
T: 713-337-0750
F: 713-337-0760
[**kalvarado@brothers-law.com**](mailto:kalvarado@brothers-law.com)

Skylar Watson
ID No. 15018
Texas Department of Public Safety, State of Texas
Investigating officer

Various healthcare providers who treated Plaintiff following the Incident

Such providers may have knowledge regarding the nature, extent, and treatment of Pena's injuries. For provider contact information, see medical records produced or which will be provided/produced herein.

- (B) a copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

Response:

- (1) PERMA 00001-15 (Haynes employment file)**
- (2) PERMA 00016-17 (Declarations Page)**
- (3) PERMA 00018-21 (Police Report)**
- (4) HAYNES 00001 (Haynes DL)**

- (C) a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

Response:

Not applicable to this Defendant.

- (D) for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to

satisfy the judgment.

Response:

FCCI Insurance Company
Policy # CA100003940
Policy period: 07/24/2017 – 07/24/2018
Limit: \$1,000,000.00

Respectfully submitted,

BROTHERS ALVARADO, P.C.

By: /s/ Karen M. Alvarado
Karen M. Alvarado
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**Attorneys for Defendants Perma R. Products, Inc.
and Jimmy Haynes**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing instrument was served upon the following counsel of record in compliance with Rule 21a of the Texas Rules of Civil Procedure on March 22, 2019.

VIA EFILE

Paul Higdon
HIGDON LAWYERS
2929 Allen Parkway, Suite 200
Houston, Texas 77019

BROTHERS ALVARADO, P.C.

By: /s/ Karen M. Alvarado
Karen M. Alvarado